IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.: 1:19 CR 35
Plaintiff,)) JUDGE SOLOMON OLIVER, JR
V.)
DEMETRIUS PITTS,)) <u>UNOPPOSED MOTION FOR</u>) <u>PROTECTIVE ORDER</u>
Defendant.)

Now comes the United States of America, by and through counsel, Justin E. Herdman, United States Attorney for the Northern District of Ohio, and Michelle M. Baeppler, Assistant United States Attorney, and hereby submits this Unopposed Motion for Protective Order agreed to by the parties governing the provision of discovery materials to Defendant pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure.

A proposed protective order is attached. Counsel for Defendant, Wesley Dumas, has indicated to the undersigned that he does not oppose the terms of the attached protective order, and has signed it, indicating his agreement and understanding of its terms. The undersigned has also signed the attached proposed order, indicating his agreement and understanding of its terms.

WHEREFORE, the United States respectfully requests that this motion be granted and that the Court issue the attached proposed protective order.

Respectfully submitted,

JUSTIN E. HERDMAN United States Attorney

By: /s/ Michelle M. Baeppler
Michelle M. Baeppler
Reg. No. 0065378
Assistant United States Attorney
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113

Tel. No.: (216) 622-3995 Fax No.: (216) 685-2378

Michelle.Baeppler@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of March 2019, a copy of the foregoing Motion for

Protective Order was filed electronically. Notice of this filing will be sent by operation of the

Court's electronic filing system to all parties indicated on the electronic filing receipt. All other

parties will be served by regular U.S. mail. Parties may access this filing through the Court's

system.

/s/ Michelle M. Baeppler

Michelle M. Baeppler

Assistant United States Attorney